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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

CYPRESS SEMICONDUCTOR CORPORATION,  
a Delaware Corporation,

Plaintiff,

v.

DEUTSCHE BANK SECURITIES INC., a  
Delaware Corporation, DEUTSCHE BANK ALEX.  
BROWN, a Division of Deutsche Bank Securities  
Inc., and DEUTSCHE BANK AG,

Defendants.

Case Number CV-11-617-CW

(Case Assigned to Hon. Claudia Wilken)

**STIPULATION AND ~~[PROPOSED]~~  
ORDER EXTENDING TIME FOR  
DEFENDANTS TO RESPOND TO  
COMPLAINT AND ADJOURNING  
NOVEMBER 29, 2011 CASE  
MANAGEMENT CONFERENCE**

Plaintiff and Defendants, by and through their respective undersigned counsel, stipulate and agree as follows:

WHEREAS, on June 2, 2011, the Court So Ordered the parties' initial stipulation extending the time for Defendants to respond to the Complaint in this action to July 11, 2011; and

WHEREAS, on July 8, 2011, the Court So Ordered the parties' second stipulation extending the time for Defendants to respond to the Complaint in this action through and including August 24, 2011; and

WHEREAS, on September 1, 2011, the Court So Ordered the parties' third stipulation extending the time for Defendants to respond to the Complaint in this action through and including September 23, 2011; and

STIPULATION AND ~~[PROPOSED]~~ ORDER EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT  
CONFERENCE - CV-11-617-CW

1 WHEREAS, on September 29, 2011, the Court So Ordered the parties' fourth stipulation  
2 extending the time for Defendants to respond to the Complaint in this action through and including  
3 October 24, 2011; and

4 WHEREAS, on October 25, 2011, the Court So Ordered the parties' fifth stipulation  
5 extending the time for Defendants to respond to the Complaint in this action through and including  
6 November 23, 2011; and

7 WHEREAS the parties have now reached agreement on the terms of a settlement and  
8 anticipate filing a stipulation of dismissal within fourteen (14) days; and

9 WHEREAS, accordingly, Defendants have met and conferred with Plaintiff and requested  
10 an additional 30-day extension of the time for all Defendants to move against, answer or respond  
11 to the Complaint (through and including December 23, 2011), by which time the parties anticipate  
12 having filed a stipulation of dismissal; and

13 WHEREAS, Plaintiff has consented to Defendants' request; and

14 WHEREAS the Court had scheduled an initial Case Management Conference for  
15 November 29, 2011 at 2:00 p.m.; and

16 WHEREAS the parties believe that there will be no need for a Case Management  
17 Conference because a stipulation of dismissal will be filed within fourteen (14) days;

18 IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, through their  
19 respective counsel, and subject to Court approval, that the time for all Defendants to move against,  
20 answer or respond to the Complaint shall be extended from November 23, 2011 through and  
21 including December 23, 2011; and

22 IT IS FURTHER STIPULATED that the Case Management Conference scheduled for  
23 November 29, 2011 at 2:00 p.m. shall be adjourned.

24 In accordance with General Order 45 of the United States District Court for the Northern  
25 District of California, I attest that concurrence in the filing of this document has been obtained  
26 from the undersigned counsel.

27  
28 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT  
CONFERENCE - CV-11-617-CW

1 DATED: November 22, 2011

Respectfully submitted,

2 By /s/ Philip J. Wang

3 Philip J. Wang (SBN 218349)

4 Justin S. Chang (SBN 205925)

5 WANG & CHANG, A PROFESSIONAL  
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12 *Attorneys for Plaintiff*

13 By /s/ William J. Goines

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21 - and -

22 Stephen L. Saxl (*Not admitted in N.D. Cal.*)

23 Toby S. Soli (*Not admitted in N.D. Cal.*)

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*Attorneys for Defendants*

**PROPOSED ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED. A case management conference will be held on Wednesday, January 18, 2012, at 2:00 p.m.**

DATED: \_\_\_\_\_ November 28, 2011



The Honorable Claudia Wilken

United States District Judge

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT  
CONFERENCE - CV-11-617-CW

ATTESTATION CLAUSE

I, William J. Goines, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT CONFERENCE. In compliance with General Order 45, X.B., I hereby attest that Philip J. Wang has concurred in this filing.

Date: November 23, 2011

GREENBERG TRAURIG, LLP

By: /s/ William J. Goines

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